

FILEDUNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICOIN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

JAN 10 2013

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JASON LUCAS,

Defendant.

CRIMINAL NO. 13-59Counts 1 - 5: 21 U.S.C. § 843(a)(3):
Acquiring or Obtaining a Controlled
Substance by Misrepresentation, Fraud,
Forgery, Deception and Subterfuge;Counts 6 - 8: 18 U.S.C. § 1347: Fraud in
Connection with a Health Care Plan.INDICTMENT

The Grand Jury charges:

Count 1

On or about February 21, 2012, in Bernalillo County, in the District of New Mexico, the defendant, **JASON LUCAS**, did unlawfully, knowingly and intentionally acquire and obtained Hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit: by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843(a)(3).

Count 2

On or about February 27, 2012, in Bernalillo County, in the District of New Mexico, the defendant, **JASON LUCAS**, did unlawfully, knowingly and intentionally acquire and obtained Oxycodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit: by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843(a)(3).

Count 3

On or about March 2, 2012, in Bernalillo County, in the District of New Mexico, the defendant, **JASON LUCAS**, did unlawfully, knowingly and intentionally acquire and obtained

Oxycodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit: by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843(a)(3).

Count 4

On or about March 20, 2012, in Bernalillo County, in the District of New Mexico, the defendant, **JASON LUCAS**, did unlawfully, knowingly and intentionally acquire and obtained Hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit: by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843(a)(3).

Count 5

On or about March 29, 2012, in Bernalillo County, in the District of New Mexico, the defendant, **JASON LUCAS**, did unlawfully, knowingly and intentionally acquire and obtained Hydrocodone, a Schedule III controlled substance, by misrepresentation, fraud, forgery, deception and subterfuge, to wit: by filling a fraudulent prescription at a retail pharmacy.

In violation of 21 U.S.C. § 843(a)(3).

Count 6

On or about March 2, 2012, in Bernalillo County, in the District of New Mexico, the defendant, **JASON LUCAS**, executed and attempted to execute a scheme and artifice to defraud a health care benefit program, the name of such program being presently unknown to the Grand Jury, into paying for controlled substances that defendant **JASON LUCAS** was obtaining by material fraud, forgery, deception and subterfuge.

In violation of 18 U.S.C. § 1347.

Count 7

On or about March 20, 2012, in Bernalillo County, in the District of New Mexico, the defendant, **JASON LUCAS**, executed and attempted to execute a scheme and artifice to defraud a health care benefit program, the name of such program being presently unknown to the Grand

Jury, into paying for controlled substances that defendant **JASON LUCAS** was obtaining by material fraud, forgery, deception and subterfuge.

In violation of 18 U.S.C. § 1347.

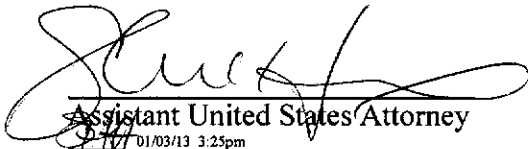
Count 8

On or about March 29, 2012, in Bernalillo County, in the District of New Mexico, the defendant, **JASON LUCAS**, executed and attempted to execute a scheme and artifice to defraud a health care benefit program, the name of such program being presently unknown to the Grand Jury, into paying for controlled substances that defendant **JASON LUCAS** was obtaining by material fraud, forgery, deception and subterfuge.

In violation of 18 U.S.C. § 1347.

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY


Assistant United States Attorney
01/03/13 3:25pm